# IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

KENNETH BOLLING,	)
Plaintiff,	)
vs.	) Case No. 2:19-CV-24
CITY OF MONTGOMERY,	)
Defendant.	)

## **DEFENDANT'S WITNESS LIST**

**COMES NOW** the Defendant City of Montgomery, and submits the following names of potential witnesses to be called in the trial of the above styled matter:

## EXPECT TO CALL:

- 1. Kenneth Bolling, Plaintiff.
- 2. Chief Miford Jordan
- 3. Ronald Sams
- 4. J.L. Petrey
- 5. Matthew Manning
- 6. Thomas Hawkins
- 7. Carrie Dunnivan
- 8. City of Montgomery Corporate Representative
  - a. City Employee Handbook
  - b. Personnel Rules
  - c. Employee benefits

#### MAY CALL:

9. Assistant Chief Stanley Cooper

- 10. Assistant Chief Ronnie Bozeman
- 11. Deputy Chief A.L. Wright
- 12. Lisa McKinnon
- 13. Ebony McKinnon
- 14. Keiona Bolling
- 15. All witnesses identified on Plaintiff's Witness List.
- 16. Any witnesses necessary for rebuttal.
- 17. Any witnesses necessary for impeachment.
- 18. Any witness necessary for authentication of evidence.
- 19. Any witnesses discovered hereafter.
- 20. The Defendant, reserves the right to amend this witness list if necessary.

Dated this the 30<sup>th</sup> day of April, 2020.

/s/Stacy Lott Bellinger STACY LOTT BELLINGER (REE050) ASB 3470 D63S

OF COUNSEL:

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on the  $30^{th}$  day of April, 2020, I electronically filed the foregoing with the Clerk of the court using the CM/ECF system which will send notification of such filing to the following parties or counsel:

K. David Sawyer, Esq.
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/s/ Stacy Lott Bellinger

Of Counsel